

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN, LOSARTAN, AND
IRBESARTAN PRODUCTS LIABILITY
LITIGATION,

MDL NO. 2875

HON. ROBERT B. KUGLER

THIS DOCUMENT RELATES TO:

Richard Ramirez v. Mylan Laboratories

Ltd., et al.,

Case No. 1:20-05595-RBK-JS

NOTICE OF VIDEOTAPED DEPOSITION OF
PLAINTIFF RICHARD RAMIREZ

PLEASE TAKE NOTICE that, in accordance with Rule 30 of the Federal Rules of Civil Procedure and the Fact Witness Deposition Protocol in this case (Case Management Order #20, filed November 17, 2020 - Document 632), Defendant Mylan Pharmaceuticals Inc. will take the deposition upon oral examination of Richard Ramirez, on **April 23, 2021 at 9:00 a.m. EST** and continuing until completion, via remote deposition while the witness is at her home or office or other location agreed to by the parties. Please take further notice that: the deposition will be conducted remotely, using audio-visual conference technology; the court reporter will report the deposition from a location separate from the witness; counsel for the parties will be participating from various, separate locations; the court reporter will administer the oath to the witness remotely; and the witness will be required to provide government-issued identification satisfactory to the court reporter, and this identification must be legible on camera. The deposition shall be videotaped and recorded stenographically and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of this case. The attorney contact for the deposition is:

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Date: April 6, 2021

Respectfully submitted,

s/ Clem C. Trischler
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*Attorney for Defendant Mylan
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CERTIFICATE OF SERVICE

I hereby certify that on April 6, 2021, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

s/ Clem C. Trischler

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